

# United States District Court

United States Magistrate Court  
Southern District of Texas  
FILED

OCT 15 2007

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Southern

DISTRICT OF

Texas

AAF

Michael N. Milby, Clerk  
Laredo Division

UNITED STATES OF AMERICA

V.

Cecil Lovice BROWN (24 yoa)  
San Antonio, Texas

and

Adrian SANDOVAL-Trujillo (32 yoa)  
San Antonio, Texas  
(Name and Address of Defendant)

## CRIMINAL COMPLAINT

CASE NUMBER:

5:07-mj-1686 -01  
-02

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or October 13, 2007 in Webb County, in the

Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

knowingly and unlawfully possess with intent to distribute a controlled substance listed under Schedule I, Title II, of the Controlled Substance Act, to-wit, approximately 41.5 kilograms, estimated gross weight, of marijuana.

in violation of Title 21 United States Code, 841 (a)(1)

I further state that I am a(n) DEA Special Agent and that this complaint is based on the following  
Official Title

facts:

See Attachment "A"

Continued on the attached sheet and made a part

☒ Yes ☐ No

Daniel A. Beaver  
Signature of Complainant

Sworn to before me, and subscribed in my presence,

October 15, 2007  
Date

at Laredo, Texas  
City and State

Adriana Arce-Flores, U.S. Magistrate Judge  
Name and Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

## ATTACHMENT "A"

On October 13, 2007, U.S. Border Patrol Agents arrested Cecil Lovice BROWN and Adrian SANDOVAL-Trujillo at the IH-35 checkpoint north of Laredo, Texas. At approximately 8:30 PM, BROWN, along with passenger SANDOVAL, approached the checkpoint while driving a blue 1994 Chevrolet Silverado pickup, bearing Texas license plate [REDACTED] registered to Cecil BROWN. During an immigration inspection of BROWN and SANDOVAL, a USBP service canine alerted to the presence of contraband and/or concealed persons underneath the rear of the vehicle. During an inspection of the vehicle by USBP agents, 2 bundles of marijuana, weighing approximately 41.5 kgs, were discovered concealed in the gas tank of the vehicle. DEA agents responded to the seizure and interviewed BROWN and SANDOVAL after advisement of their Miranda Rights. BROWN stated that he knew that there was marijuana concealed within the vehicle and was going to get paid \$10,000 by SANDOVAL to assist in the transportation of the marijuana from Nuevo Laredo, MX to San Antonio, TX. SANDOVAL stated that the marijuana located in the gas tank of the vehicle was his and advised agents that he purchased the marijuana in Zacatecas, Mexico approximately 2 months ago for \$60 per kilogram. BROWN and SANDOVAL were subsequently processed and transported to the Webb County Jail pending their initial appearance in Federal Court.